

# **EXHIBIT J**

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**From:** Erika Lee <leerikalatise@gmail.com>  
**Sent:** Thursday, January 30, 2025 11:55 AM  
**To:** Fleming, Michael F.  
**Subject:** Re: Lee v. Delta Air Lines, Inc. 1:22-cv-08618-DEH-RWL - Deficiency Letter and 30(b)(6) objections and responses

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

[EXTERNAL EMAIL]

Mr. Fleming,

You are in violation of your discovery obligations under FRCP.

Therefore, you harass me with these frivolous letters attached which have no legal or factual basis. I DO NOT HAVE IN MY POSSESSION ANY OTHER DOCUMENTS. All of my interrogatory responses were complete and I gave you all potential witness names.

The \$20,000,000.00 in damages are combination of punitive and emotional damages that a jury may or may not award.

I will get my HIPAA medical release for my one and only doctor notarized. THERE ARE NO OTHER DOCTORS RELEVANT!

All of your frivolous discovery issues have now been answered.

On Thursday, January 30, 2025, Gunn, Imani D. <[imani.gunn@morganlewis.com](mailto:imani.gunn@morganlewis.com)> wrote:

Ms. Lee,

Attached, please find Delta's responses and objections to your updated Notice of 30(b)(6) Deposition, as well as a deficiency letter regarding your failure to comply with the Court's January 15 Order.

Thank you,

**Imani D. Gunn**

**Morgan, Lewis & Bockius LLP**